

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**WILL O. KING,**

:

**JURY TRIAL DEMANDED**

**Plaintiff,**

:

**CIVIL ACTION FILE NO.**

**v.**

:

**1:15-CV-0583-TWT**

**KYLEMA JACKSON,**

:

**Individually and in his Official**

:

**Capacity as a City of Atlanta**

:

**Police Officer, and**

:

**THE CITY OF ATLANTA**

:

**Defendants.**

:

**PLAINTIFF'S FIRST AMENDMENT TO  
INITIAL AND EXPERT DISCLOSURES**

Comes now Will O. King, Plaintiff herein, and amends his initial and expert disclosures, under Disclosure 4, Attachment "B", by identifying, Dr. George Kirkham of Dr. George Kirkham and Associates, Inc. as a person who is expected to testify at the trial of this case as an expert witness. Attached hereto is Dr. Kirkham's Professional Vita and list of cases in compliance with Rule 26(a)(2)(B) of the Federal Rules of Civil Procedure, and Plaintiff will produce a preliminary report by supplement.

Plaintiff also amends his initial and expert disclosures by identifying under Disclosure 4, Attachment "B", all medical providers previously identified in

Plaintiff's Initial Disclosures under Disclosure 3 Attachment "A", as persons who may be expected to testify at the trial of this case as non-retained expert witnesses, whose reports and/or records have been previously produced to Defendants prior to the commencement of this litigation, but are being produced again to the Defendants.

This 19<sup>th</sup> day of July, 2015.

/s/ James D. McGuire  
**James D. McGuire**  
Georgia Bar No. 493325  
**Richard B. Crohan**  
Georgia Bar No. 197120  
rcrohan@mcklaw.org  
Counsel for Plaintiff

McGuire, Crohan & Klinger  
Not A Partnership  
1800 Peachtree Street, Suite 514  
Atlanta, Georgia 30309  
404-351-8500 main line  
404-351-8805 fax  
jmcguire@mcklaw.org

**Stanford N. Klinger**  
Georgia Bar No. 425191  
Counsel for Plaintiff

1031 Juniper Street  
Atlanta, Georgia 30309  
404-892-1212  
stanklinger@gmail.com

### Plaintiff's First Amended Attachment "B"

Dr. George Kirkham is a person who is expected to testify at the trial of this case as an expert witness. Attached hereto is Dr. Kirkham's Professional Vita and list of cases in compliance with Rule 26(a)(2)(B) of the Federal Rules of Civil Procedure, and Plaintiff will produce a preliminary report by supplement.

Dr. George Kirkham and Associates, Inc., 1402 James Bay Road, Palm Beach Gardens, FL 33410, (800) 488-9231. (Anticipated subject matter includes but is not limited to the Atlanta Police Department's violations of professional standards, practices and protocols in the hiring, retention and supervision of Kylema Jackson, despite his known predisposition for violent behavior that resulted in numerous instances in which Jackson used excessive force and violated the Constitutional rights of many individuals. The City's failure and refusal to discipline Jackson commensurate with his unconstitutional behavior taught, encouraged and emboldened him and was a moving force for the unconstitutional excessive force in the shooting of Will O. King. He is also expected to testify that Kylema Jackson, in addition to violating the Constitutional rights of Will O. King, breached professional standards, practices and protocols.)

Plaintiff's medical providers, non-retained expert witnesses:

South Fulton Hospital personnel, 1170 Cleveland Ave., Atlanta, GA, (Anticipated subject matter include injuries and initial emergency treatment, including, but not limited to, that shown in the medical records produced to the Defendants.)

South Fulton Emergency Physicians, 1170 Cleveland Ave., Atlanta, GA, (Anticipated subject matter include injuries and emergency treatment including, but not limited to, that shown in the medical records produced to the Defendants.)

Radisphere personnel, (Anticipated subject matter include Radiological findings including, but not limited to, that shown in the medical records produced to the Defendants.)

EMS Ventures personnel, (Anticipated subject matter includes emergency transport to Atlanta Medical Center including, but not limited to, that shown in the medical records produced to the Defendants.)

Amanda Turner, Rural Metro Ambulance/South Fulton EMS, 250 Hembree Park Drive, Suite 112, Roswell, GA 30076. (Anticipated subject matter includes injuries, treatment and transport, including, but not limited to, that shown in the medical records produced to the Defendants.)

Bobbie Boswell, Rural Metro Ambulance/South Fulton EMS, 250 Hembree Park Drive, Suite 112, Roswell, GA 30076. (Anticipated subject matter includes injuries, treatment and transport including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. Vernon Henderson, Atlanta Medical Center, 303 Parkway Drive, NE, Atlanta, GA 30312 (Anticipated subject matter includes injuries, surgery and treatment including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. Earl Stephenson, Atlanta Medical Center, 303 Parkway Drive, NE, Atlanta, GA 30312 (Anticipated subject matter includes injuries, surgery and treatment including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. Stephen McBride, Atlanta Medical Center, 303 Parkway Drive, NE, Atlanta, GA 30312 (Anticipated subject matter includes injuries, surgery and treatment, including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. J.M. Moore, Atlanta Medical Center, 303 Parkway Drive, NE, Atlanta, GA 30312 (Anticipated subject matter includes injuries, surgery and treatment, including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. Hugo Falcon, Diagnostic Imaging Specialists, P.O. Box 591 Columbus, GA 31902 (Anticipated subject matter includes radiological findings, injuries, surgery and treatment, including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. Howard Zaleznak, AMC Emergency Physicians, Atlanta Medical Center, 303 Parkway Drive, NE, Atlanta, GA 30312 (Anticipated subject matter includes radiological findings, injuries, surgery and treatment, including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. Steven Bondell, Atlanta Pathology Hospital Services, P.O. Box 767877 Roswell, GA 30076 (Anticipated subject matter includes pathology findings, injuries and treatment, including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. Daniel Marshburn, Northlake Anesthesia Professionals, P.O. Box 932925, Atlanta, GA 31193 (Anticipated subject matter includes anesthesia services, including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. Phillip Baptiste, Diagnostic Imaging Specialists, P.O. Box 591 Columbus, GA 31902 (Anticipated subject matter includes radiological findings, injuries, surgery and treatment, including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. Kimberly Spencer, Diagnostic Imaging Specialists, P.O. Box 591 Columbus, GA 31902 (Anticipated subject matter includes radiological findings, injuries, surgery and treatment, including, but not limited to, that shown in the medical

records produced to the Defendants.)

Dr. Kristin Lewis, Diagnostic Imaging Specialists, P.O. Box 591 Columbus, GA 31902 (Anticipated subject matter includes radiological findings, injuries, surgery and treatment, including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. Michael Chaliff, Diagnostic Imaging Specialists, P.O. Box 591 Columbus, GA 31902 (Anticipated subject matter includes radiological findings, injuries, surgery and treatment, including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. Bradley Fricke, Diagnostic Imaging Specialists, P.O. Box 591 Columbus, GA 31902 (Anticipated subject matter includes radiological findings, injuries, surgery and treatment, including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. Eric Udoff, Diagnostic Imaging Specialists, P.O. Box 591 Columbus, GA 31902 (Anticipated subject matter includes radiological findings, injuries, surgery and treatment, including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. Philip Ramsay, Atlanta Medical Center South Campus, 1170 Cleveland Ave. Atlanta, GA 30344 (Anticipated subject matter includes radiological findings, injuries, surgery and treatment, including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. Thomas Wood, Atlanta Medical Center, 303 Parkway Drive, NE, Atlanta, GA 30312 (Anticipated subject matter includes radiological findings, injuries, surgery and treatment, including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. James Clark, Diagnostic Radiology / Atlanta Medical Center, 303 Parkway Drive, NE, Atlanta, GA 30312 (Anticipated subject matter includes radiological findings, injuries, surgery and treatment, including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. William Wright, Diagnostic Radiology / Atlanta Medical Center, 303 Parkway

Drive, NE, Atlanta, GA 30312 (Anticipated subject matter includes radiological findings, injuries, surgery and treatment, including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. Richisa Hamilton, Atlanta Medical Center South Campus, 1170 Cleveland Ave., Atlanta, GA 30344 (Anticipated subject matter includes radiological findings, injuries, surgery and treatment, including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. Fredrick Work, Atlanta Center for Breast and Aesthetic Surgery, One Baltimore Place, Suite 400, Atlanta, GA 30308. (Anticipated subject matter includes radiological findings, injuries, surgery, treatment, infections, prognosis and permanency, including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. Sanjeev Kaila, Atlanta Center for Breast and Aesthetic Surgery, One Baltimore Place, Suite 400, Atlanta, GA 30308. (Anticipated subject matter includes radiological findings, injuries, surgery, treatment, prognosis and permanency, including, but not limited to, that shown in the medical records produced to the Defendants.)

First Assistant to Dr. Work, Tu Oai Pham, Atlanta Center for Breast and Aesthetic Surgery, One Baltimore Place, Suite 400, Atlanta, GA 30308. (Anticipated subject matter includes radiological findings, injuries, surgery, and treatment, including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. Timothy T. Ramsey, Southern Regional Medical Center, 11 Upper Riverdale Road, SW Riverdale, GA 30271. (Anticipated subject matter includes radiological findings, injuries, surgery and treatment, including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. Walter H. Smith, Southern Regional Medical Center, 11 Upper Riverdale Road, SW Riverdale, GA 30271. (Anticipated subject matter includes radiological findings, injuries, surgery and treatment, including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. Dipti Anand, SkinPath Solutions, 2000 Lake Park Drive, SE, Smyrna, GA 30080. (Anticipated subject matter includes radiological findings, injuries, surgery

and treatment, including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. Anitha Mathew, Grady Health System, P.O. Box 930704, Atlanta, GA 31193 (Anticipated subject matter includes injuries, surgery and treatment, including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. Gary Bouloux, Grady Health System, P.O. Box 930704, Atlanta, GA 31193 (Anticipated subject matter includes injuries, surgery and treatment including, but not limited to, that shown in the medical records produced to the Defendants.)

Doctors, nurses and other personnel with Atlanta Medical Center, 303 Parkway Drive, NE, Atlanta, GA 30312 (Anticipated subject matter includes injuries, surgery and treatment including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. Matthew Lim, Southern Regional Medical Center, 11 SW Upper Riverdale Road, Riverdale, GA 30274 (Anticipated subject matter includes radiological findings, injuries, surgery, treatment and pathology including, but not limited to, that shown in the medical records produced to the Defendants.)

Dr. Tyler Crickette, Southern Regional Medical Center, 11 Upper Riverdale Road, Riverdale, GA 30274. (Anticipated subject matter includes radiological findings, injuries, surgery and treatment including, but not limited to, that shown in the medical records produced to the Defendants.)

Doctors, nurses and other personnel at Southern Regional Medical Center, 11 SW Upper Riverdale Road, Riverdale, GA 30274 (Anticipated subject matter includes radiological findings, injuries, surgery, treatment and bacteria growth including, but not limited to, that shown in the medical records produced to the Defendants.)

Doctors, nurses and other personnel at Atlanta Center for Breast and Aesthetic Surgery, One Baltimore Place, Suite 400, Atlanta, GA 30308. (Anticipated subject matter includes radiological findings, injuries, surgery and treatment including, but not limited to, that shown in the medical records produced to the Defendants.)

For all of the medical providers identified in Plaintiff's Initial Disclosures, Plaintiff



produces the records and reports of those medical experts.

# *Dr. George Kirkham and Associates, Inc.*

**Criminal Justice Consultants**

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## **Professional Vita**

### **Education**

B.A. Criminology, California State University at San Jose  
("With Distinction" and "Departmental Honors in Criminology")

M.S. Criminology, California State University at San Jose

D. Crim., University of California at Berkeley

### **Present Occupation**

Professor Emeritus, College of Criminology and Criminal Justice, Florida State University,  
Tallahassee, Florida.

### **Law Enforcement Consultation**

Experience as a private consultant and expert witness for both plaintiff and defense in over 1,500 cases of civil litigation arising from police actions, private security operations and jail and confinement conditions in nearly every state.

Executive Director and Certification Board Member of the National Academy of Police  
Specialists (N.A.P.S)

Former Associate Member: International Association of Chiefs of Police (I.A.C.P)

Former Member: Police Benevolent Association (P.B.A.)

Certified Police Officer, State of Florida (1973-1992)

Author, with Professor James D. White, of a series of police civil liability training videos and instructional manuals currently in use throughout the United States (See "Publications") in the training of both line officers and administrators.

Past Member, Board of Directors, Americans for Effective Law Enforcement;  
A.E.L.E. is a non-profit legal research organization founded by Fred Inbau, John Henry Wigmore  
Professor of Law Emeritus at Northwestern University; it serves the law enforcement profession  
through amicus curiae briefs, publications, workshops and research programs.

Member, Board of Directors, International Law Enforcement Stress Association (ILESA).

Director, National Conference on Stress in Policing (Orlando, Florida).

Served as an instructor, lecturer, or consultant to the following agencies and organizations:

Callahan Commission, Massachusetts Police Training Council

British Metropolitan Police, Peel Centre

New York City Police Department, Police Benevolent Association

NBC News, for proposed documentary on convicted mass-murderer Theodore Bundy

Detroit Police Officers' Association

Philadelphia Police Department

Pennsylvania State Police

Virginia State Police

Maine State Police

Yonkers, New York, Police Department

Police Officers Association of Michigan

Albuquerque, New Mexico Police Department

Cincinnati, Ohio Police Department

Dayton, Ohio Police Department

Roanoke, Virginia Police Department

Toronto Metropolitan Police

United States Military Police Training Center, Fort McLellan, Alabama

United States Treasury Department, Consolidated Federal Law Enforcement Training Center

Federal Bureau of Investigation, Quantico, Virginia

Northwestern Traffic Institute

International Association of Women Police

**North Carolina Law Enforcement Officer's Association**

**Advisory Council on Sheriff Affairs, Lorain, Ohio**

**Florida Sheriff's Association**

**Florida Peace Officer's Association**

**State of Indiana, Fraternal Order of Police**

**Southern Police Institute**

**Law Enforcement Assistance Administration (L.E.A.A.)**

**Kenosha, Wisconsin Professional Police Association**

**Ohio Association of Police Chiefs**

**Western Colorado Peace Officers Association**

**National Association of State Directors of Law Enforcement Training (N.A.S.D.L.E.T.)**

**Florida Police Standards and Training Commission**

**Jacksonville, Florida Police Department**

**St. Petersburg, Florida Police Department**

**Tallahassee, Florida Police Department**

**Office of the State Attorney, 16th Judicial Circuit of Florida (for investigative evaluation of organizational and personnel problems within the Key West, Florida Police Department)**

**Office of the State Attorney, 15th Judicial Circuit of Florida, Palm Beach County, Florida**

**Office of the State Attorney, Miami, Florida**

**Member, Selection Board for Chief of Police for Fort Walton Beach, Florida**

**New Port Richey, Florida Police Department**

**National Institute for Occupational Health and Safety, U.S. Department of Health,**

**Education and Welfare (for police stress research)**

**Leon County Sheriff's Department**

**Florida Highway Patrol**

**National College of District Attorneys**

**California District Attorneys' Association**

**Florida Criminal Justice Educators Association**

**Americans for Effective Law Enforcement (A.E.L.E.), Evanston, Illinois, Past Board Member**

**Florida Public Defenders Association**

**Florida Professional Practices Council**

**State of Utah Peace Officers Association**

**Columbia, South Carolina Criminal Justice Academy**

**Wisconsin Department of Justice**

**Florida Police Task Force, Governor's Committee on Criminal Justice Standards and Goals**

**Utah League of Cities**

### **Other Professional Experience**

**Research Criminologist, Systems Analysis Division, Stanford Research Institute, Menlo Park, California.**

**Project Director and Research Associate, The Center for Interdisciplinary Studies, California State University at San Jose**

**Consulting Editor, Journal of Police Science and Administration**

**Editorial Consultant, Harper and Row Publishers, Media Division**

**Graduate, Florida Police Standards and Training Academy**

**Police Patrolman, City-County of Jacksonville, Florida**

**Police Officer, City of Tallahassee, Florida**

**Deputy Sheriff, Leon County, Florida**

Agent, Organized Crime Division, Broward County Sheriff's Department under U.S. Department of Justice Grant

Correctional Counselor, California Department of Corrections, Soledad State Prison

Director, National Study of Jail Inmates on Work Release, Santa Clara County Jail, Elmwood Rehabilitation Facility

Doctoral level counseling under supervision of psychoanalyst Bernard L. Diamond, M.D., at Langley Porter Neuropsychiatric Clinic and Mount Zion Hospital Outpatient Psychiatric Clinic

### **Published Works:**

#### **Books**

George Kirkham & Leonard Territo, *Ivory Tower Cop* (Durham: Carolina Academic Press, 2009).

George Kirkham & Leonard Territo, *Criminal Investigation Instructor's Manual for Ivory Tower Cop* (Durham: Carolina Academic Press, 2009).

Leonard Territo & George Kirkham, *International Sex Trafficking of Women and Children: Understanding the Global Epidemic* (New York: Looseleaf Law Publications, 2010).

George L. Kirkham & Laurin Wollan, *Introduction to Law Enforcement* (New York: Harper and Row, 1979). George L. Kirkham, *Signal Zero: The True Story of a Professor Who Became a Cop* (New York: J.B. Lippincott, 1976). Selected by Book-of-the-Month Club as November 1976 Alternate. (Motion picture options sold to David Hartman of ABC)

George L. Kirkham, *Signal Zero: The True Story of a Professor Who Became a Cop*, (New York: J.B. Lippincott, 1976). Selected by Book-of-the-Month Club as alternate.

#### **Educational Films & Video Tapes**

George L. Kirkham and James D. White, *Police Human Relations: Non-Verbal Communication, Parts I, II, & III* (Tallahassee, Florida: The Florida State University and the Tallahassee Police Department, Freestyle Productions, (1989)

George L. Kirkham and James D. White, *Police Civil Liability: Negligent Operation of Police Motor Vehicles* (New York: Harper and Row, 1978)

George L. Kirkham and James D. White, *Negligent Use of Police Firearms* (New York: Harper and Row, 1978).

George L. Kirkham and James D. White, *Police Use of Deadly Force* (New York: Harper and Row, 1979).

George L. Kirkham and James D. White, *Excessive Force and the Police* (New York: Harper and Row, 1979).

George L. Kirkham and James D. White, *Police Supervisory Liability* (New York: Harper and Row, 1979).

George L. Kirkham and James D. White, *Police Officers and the Federal Civil Rights Act* (New York: Harper and Row, 1979)

George L. Kirkham, *Police: The Human Dimension: "Stress"* (New York: Harper and Row, 1976)

George L. Kirkham, *Officer Stress Awareness* (New York: Harper and Row, 1976)

George L. Kirkham, *Internal Adaptations to Stress in Modern Law Enforcement* New York: Harper and Row, 1976)

George L. Kirkham, *External Reactions to Stress in Policing* (New York: Harper and Row, 1976).

George L. Kirkham, *The Police Marriage: Personal Issues* (New York: Harper and Row, 1976).

George L. Kirkham, *Police Children: Issues and Problems* (New York: Harper and Row, 1976).

George L. Kirkham, *The Police Marriage: Social Pressures Affecting It* (New York: Harper and Row, 1976).

George L. Kirkham, *Police Authority and Informal Discretion, Part I* (New York: Harper and Row, 1976).

George L. Kirkham, *Police Authority and Informal Discretion, Part II* (New York: Harper and Row, 1976).

George L. Kirkham, *Minorities and the Police* (New York: Harper and Row, 1976).

\* Recipient of the Golden Eagle Award, Council on International Non-Theatrical

\* Events: selected to represent the United States in motion picture events abroad. Also awarded The Chris Plaque, Columbus Film Festival (1976).

George L. Kirkham, *Police Ethics: Part I* (New York: Harper and Row, 1976).

George L. Kirkham, *Police Ethics: Part II* (New York: Harper and Row, 1976).

George L. Kirkham, *The Police Officer in the Community Part I* (New York: Harper and Row, 1976).

George L. Kirkham, *The Police Officer in the Community: Part II* (New York: Harper and Row, 1976).

**Articles and Professional Papers**

George L. Kirkham, "Police Firearms Accidents," *Police* (May, 1989), Vol. 12, No.3.

George L. Kirkham and James D. White, "Body Language and Policing: A Training Series," Parts I, II, & III (Tallahassee, Florida: The Florida State University, 1990)

George L. Kirkham, Convener, "Death Behind Bars," (Panel Presentation on the problem of suicide in Jails and Prisons), Southern Conference on Corrections, (February, 1989).

George L. Kirkham and James D. White, "A Police Civil Liability Handbook," Harper and Row, 1976).

George L. Kirkham, "The Policeman and the Law: A Changing Perspective," *Barrister* (December, 1976).

George L. Kirkham, "The Criminologist as Police Officer; A Participant-Observation Study," paper presented to the American Society of Criminology; subsequently published in Donal E.J. MacNamara and Frank Reidel, *Police: Problems and Prospects* (New York: Praeger, 1975)

George L. Kirkham, "On the Etiology of Police Aggression in Black Communities," paper presented to the American Society of Criminology (1974).

George L. Kirkham, "Doc Cop," *Human Behavior* (May, 1975).

George L. Kirkham, "A Professor's Street Lessons," *F.B.I. Law Enforcement Bulletin* (March, 1974); reprinted as "From Professor to Patrolman: A Fresh Perspective on the Police," *The Journal of Police Science and Administration* (May, 1974); also reprinted by numerous law enforcement journals throughout the world, including Interpol.

George L. Kirkham, "Jail Inmates on Work Furlough," with T. Conway Esselstyn, Ph.D., et. al., *Criminologica* (November, 1969). Also presented by Dr. Kirkham at the joint annual meeting of the American Society of Criminology and the American Association for the Advancement of Science (1968).

George L. Kirkham, "Evaluating Work Furlough," with Alvin Rudoff, Ph. D., et. al., *Federal Probation* (March, 1971).

George L. Kirkham, "The Potential Rehabilitative Role of Work Release Programs for Jail and Prison Inmates," paper presented at the First Inter-American Congress on Criminology, San Juan, Puerto Rico, 1971

George L. Kirkham, "The Utility of Internships as an Educational Device in the Field of



Criminology," paper presented (in absentia) at the Second Inter-American Congress of Criminology, Caracas, Venezuela (1971)

"Work Release Programs for Jail Inmates: Their Economic and Rehabilitative Value" with T. Conway Esselstyn, Ph.D. and Alvin Rudoff, Ph.D.

### **Research Grants**

"Model Police Interpersonal Communications Training Project," Law Enforcement Assistance Administration

"Training Municipal Police in Community Relations and Emotional Control Skills," Law Enforcement Assistance Administration

"Enrichment of the Criminology Curriculum at Florida State University"

"Training Correctional Personnel in Stress Management Techniques," National Institute of Corrections and Florida Division of Corrections (with Professor James D. White)

### **National Recognition and Community Service Awards**

Innovative research and work in the field of law enforcement have been the subject of numerous national media programs and publications, including:

CBS "60 Minutes"

NBC "Tomorrow Show"

ABC "Good Morning America"

Newsweek

U.S. News & World Report

People Magazine

Reader's Digest

J. Edgar Hoover Award "... for outstanding contributions to effective law enforcement" (Miami Beach, 1976)

Distinguished Service Award, Reserve Law Officers Association of America

26th Annual Freedom's Foundation at Valley Forge Award for the 1975 article, "What a Professor Learned When He Became A Cop"

"Award of Appreciation in Recognition of Outstanding Service on Behalf of Municipal Police in the State of Ohio," Ohio Association of Chiefs of Police

"Award of Recognition," Toronto Metropolitan Police

Optimist International Award for Outstanding Service to Law Enforcement"

"Award in Recognition of Outstanding Service to Law Enforcement Nationwide," Florida Peace Officers Association

"Award for Outstanding Contributions to Law Enforcement Education and the American Justice System," California Association of Justice Educators

"Award of Recognition," Southern Police Institute, University of Louisville

Listed in "Who's Who in Law Enforcement"

Founder, Officer Ernest Ponce de Leon Memorial Law Enforcement Scholarship at Florida State University College of Criminology and Criminal Justice

# *Dr. George Kirkham and Associates, Inc.*

Criminal Justice Consultants

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2014

Estate of Mario Blanco v. Caribbean Isles Villas Condominium  
Miami-Dade County Court  
Case #: 10-49453CA10  
Atty: Brett Yonon

Amy Rachel vs City of Mobile, AL and Michael T. Williams, et al  
USDC, Southern District, Southern Division  
Civil Action No. 13-522  
Atty: Erik S. Heninger

Ramon and Susan Torres v. Hooters of Jacksonville, LLC  
Duval County Court  
Case #: 098-98-001  
Atty: Lindsay L. Tygart

Jean Nesca  
Palm Beach County Superior Court  
Case #: Settled  
Atty: Byrnes Guillaume

Jonathan Ferrell v. The City of Charlotte, County of Mecklenburg  
Superior Court of Mecklenburg County  
Atty: Christopher Chestnut

Mastrata v. Walgreens  
Miami-Dade County Superior Court  
Atty: J. P. Gonzalez-Sirgo

Scott Rowe v. BP&P of Northeast Florida, Inc. D/b/a Brewster's Pub & Pit  
Duvall County Superior Court  
Case #: 460-130036  
Atty: Howard C Coker and Daniel A. Iracki

Scott Jones vs. Jaguars Gold Club  
Taylor County Superior Court  
Case #: 9837-D  
Atty: Greg Allen

Jason Chessher v Crestview Police Department  
The Circuit Court in Okaloosa County, Florida  
Case #: 2011-CF-002248  
Atty: Gillis E. Powell, Jr

Estate of Torres v. Pelican Isles Limited Partnership, et al.  
Brevard County Superior Court  
Atty: Douglas R Beam

Greer v. Brevard County Sheriff's Office, Indianalantic Police Department  
Brevard County Superior Court  
Atty: Douglas R Beam

John Doe v. Jeffrey Mark, Professional Bowlers Association and Storm  
Brevard County Superior Court  
Atty: Douglas R Beam

Treavor Eimers vs City of Key West, a Florida municipality, et al  
Court: Miami-Dade County  
Case #: Settled  
Atty: David W. Brill

Pringle v. Charleston County, et al.  
Charleston County Superior Court  
Case #: 2013-CP-31-322  
Atty: Robert V. Phillips

Ernest Russell, et al vs. Darlington County Sheriff's Office, et al  
Darlington County Superior Court  
Civil Action No: 2013-CP-16-0825  
Atty: Robert V. Phillips

Gere v. Charleston County, et al.  
Charleston County Superior Court  
Atty: Robert V. Phillips

Deonna Thomas vs. Boynton Pinchurst, LLC d/b/a Aventine at Boynton Beach, et al  
Palm Beach County Superior Court  
Case #: 12-043  
Atty: Michael J. Brevda

Timothy Bowker v. The Savannah Club  
Court of Martin County  
Atty: Jeff D. Vastola

Huang, Zhi Wei v. Westchase Apartments  
Lee County Superior Court  
Case #: 2002-0338-00  
Atty: Thomas E. N. Shea

State of Arkansas v. Paul Bemby  
Court: Washington County Court  
Case No: CR-2012-698-2  
Atty: W. Blair Brady

Linda & Terry Jackson v City of Baytown  
55th State Judicial District Court – Harris County, Texas  
Cause No. 2013-09168  
Atty: Arthur J. Gonzalez

Michelle Monemayor vs. Taymax Fitness LLC; SP Pavilions, LLC; RPD Property Management Company, LLC;  
Transwestern Commercial Services, LLC; and Yu Masaki  
District Court, 288th Judicial District, Bexar County Texas  
Cause No. 2012-CI-01966  
Atty: Manuel Maltos

Gomez  
Miami-Dade County Superior Court  
Case #: Settled  
Atty: David P. Lister and Tamatha S. Alvarez

Mahmud, E/O Shihab v. Chevron & South Florida Commercial Property, LLC  
Palm Beach County Superior Court  
Case #: 14-1847  
Atty: Adam S. Doner

Estate of Harper v. Felcor, et al dba Embassy Suites  
Palm Beach County Superior Court  
Atty: Adam M. Balkan

Quigley vs. Palm Beach Yacht club, et al.  
Palm Beach County Superior Court  
Case #: 20121387  
Atty: John A. Shipley

Meckler v. OCDC  
Orangeburg County Superior Court, SC  
Atty: Andrew J. Brown

Camberdella v. PBSO  
Palm Beach County Superior Court  
Case #: 12-125  
Atty: Jennifer M. Lipinski

Williams v. Sunshine Mart & BP Products  
Duval County Superior Court  
Atty: C. Douglas Green

## 2013

Douglas Howard v. Monkey's Uncle Tavern  
24th Judicial Circuit – Duvall County Division CV-G  
Case # 16-2012-CA-0011208  
Atty: Daniel Iracki

Russell Buddie v. Savoy  
Broward County Court  
Case # 12-21324  
Atty: Aaron Finesilver

Tasheen Dyer v. City of New York, et al  
Southern District Federal Court, New York  
Case # 11-CIV-7051 (TPG)  
Atty: Jared R. Cooper

Carlos Chacon v City of Austin Texas, Officer Eric Copeland and Officer Russell Rose  
U.S. Western District Court – Austin Division  
Case # 1:12-CV-226-SS  
Atty: Erica L. Grigg

Butler v Schiralli, et al  
U.S. District Court, Northern District of Georgia  
Case # 1:12-cv-0872  
Atty: Michael P Carvalho

Estate of Robert Lamble v Charleston County, et al  
County of Charleston, SC  
Case # 2012-CP-10-0983  
Atty: C. Carter Elliott, Jr

Estate of Robert Lamble v Albert Bing, et al  
Federal Court of Charleston, SC  
Case # 0:12-cv-02772-SB-PJG  
Atty: C. Carter Elliott, Jr

Cento v. Brittany of Rosemont  
Circuit Court of the Ninth Judicial Circuit in and for Orange County, Florida  
Case # 2011-CA-012037-0  
Atty: Daniel P. Osterndorf

George and Michael Hyman v. The Georgetown County Sheriff Department  
Court - Currently Available  
Case # 08-CP-22-1413  
Atty: Marion C. Fairey, Jr

Nga Pham, Thuc Huynh and Truc Huynh, Individually and as Personal Representatives of the Estate of Hao Huynh,  
Deceased vs. St Del Rio Holdings, L.P. d/b/a Catalina Village Apartments, et al  
281st Judicial District Court of Harris County, Texas  
Case # 2012-16150  
Atty: Ba M. Nguyen

Jane Doe vs. Carnival Cruise Lines  
U.S. District Court – Southern District of Florida (Miami Division)  
Case # 1:12-CV-22241-CMA  
Atty: Joseph Rinaldi

Rader v. Estate of Melbourne Police Dept  
Court: Currently Available  
Case # ME-27-0051  
Atty: Raymond Bodiford

Cobb-Sutherland vs Laurens County Sheriff's Office  
State of SC County of Greenwood  
Case # 2011-CP-30-903  
Atty: Albert V. Smith

Brenda Mason, et al vs. City of Lafayette, et al  
U.S. District Court – Western District of Louisiana – Lafayette Division  
Case # 6:12-CV-02939  
Atty: Laborde / Speer

James Ryan Singletary v. Brevard County Sheriff's Office  
In the Circuit Court of the 18th Judicial Circuit in and for Brevard County, Florida  
Case # 052012-CF-054361-AXXX  
Atty: Hank Hornsby

Aguayo, et al v. Trujillo, et al  
Court: Currently Available  
Case # D-101-CV-2012-1489  
Atty: Matthew L. Garcia

State of Florida v. Burtshin  
Superior Court of Palm Beach County  
Case # 2010CF012773A  
Atty: Mitchell J. Beers

Obie Dean v. City of Prichard, et. al.  
United States District Court  
Case # 12-0596  
Atty: Thomas R. Boller

Mack Neil Myers v. Paula Rector Jackson, et al  
Federal Court of Charleston, SC  
Case # 0:12-cv-02526-TMC-PJG  
Atty: C. Carter Elliott, Jr

Tyler v. Community Food Stores, Inc  
Case: Settled pre-suit  
Atty: Joseph T. Kissane

Perratto v. Shore Restaurants  
Martin County 19th Judicial Circuit  
Case # 12-CA-1942  
Atty: Mark DiCowden

Thomas Easterling v. Burger King, et al  
Court: Charleston County  
Case # 2011-CP-10-4348  
Atty: D. Ellis Roberts

LaFretta Watkins v. MRB, Inc. dba 50 Yard Line Sports Bar & Grill  
Fulton County State Court  
Case # 13-EV-017647Y  
Atty: Keenan R. S. Nix

Campbell v. City of Pensacola  
United States District Court  
Case # 3:13-cv-161  
Atty: Clifford Higby

Frank Kiser, II vs. Ashland Hospital Corporation, et al  
Boyd Circuit Court  
Case # 13-CI-407  
Atty: Michael J. Curtis

Matthew Talley  
Court: Broward County  
Case # Currently Available  
Atty: Todd Middlebrooks

Steven Aguanno vs. Nob Hill Connection Corp  
15th Judicial Circuit, Broward County  
Case # CACE-11-031310 (04)  
Atty: Peter A Dyson

Modica, Jonathan; Modica, Charles; Hills, Frederic v. Jupiter Tiki d/b/a The Corners, Michael (Kracker ) White and Daniel Berg  
Court: Palm Beach County Court  
Case # 502012CA019732XXXXMB  
Atty: Richard D. Schuler

Shawana Newson v. Stirling Apts, Assoc Ltd, et al  
Court: Palm Beach County  
Case # Currently Available  
Atty: John Patterson

Taunya Lou Stephens Jeter, et al vs. South Carolina Department of Corrections, et al  
Court - settled  
Case # 2012-CP-18-1661  
Atty: C. Carter Elliott, Jr

Lacy Lamb  
Court: Currently Available  
Case #: Currently Available  
Atty: T. Ryan Langley

Ephraim Slaton and Gwendolyn Tolliver obo Matthew Green v. Tyrone Jenkins, et al  
Court: Currently Available  
Case #: Currently Available  
Atty: Gino Brogdon, Jr



Wilkerson, Steve vs. Knight's Pub  
Court: Currently Available  
Case #: Currently Available  
Atty: Joseph H. Shaughnessy

Darlene Herbert as representative of the Estate of John Torre v. Pelican Isles, et al  
Court: Currently Available  
Case #: Currently Available  
Atty: Douglas R. Beam

Estate of Christopher Greer v. Brevard County S. O., et al  
Court: Currently Available  
Case # Currently Available  
Atty: Douglas R. Beam

Brophy – Miller v. Professional Bowlers Assn v. Jeffrey Mark  
Court: Currently Available  
Case # Currently Available  
Atty: Douglas R. Beam

Reynoso v. Buddha Entertainment et al  
Clark County District Court  
Case # A-13-682896-C  
Atty: Benjamin P. Cloward

Angelo Kallas v. Scott Yoder, et al  
Court: Currently Available  
Case # 13-CV-80979  
Atty: Stuart N Kaplan

Karen Perez vs. 1st and 10 Sports Bar & Grill, Developers Diversified Realty Corp, Palm Beach County Sheriff's Office, Sheriff Rich Bradshaw, and Deputy Michael Suszscynski  
Court: Currently Available  
Case # Currently Available  
Atty: Matthew D Levy

Barney Gilbert vs. Tria Adelfi, LLC; Oak Knoll Renaissance, Inc; Oak Knoll Renaissance Limited Partnership;  
Aaron Scott; Andre Scott, Antoine Lyons  
Court: Currently Available  
Case # 45D11-1105-CT-00108  
Atty: Donald W Wruck

Brian Simons vs Walmart and Bank of America  
Court: Currently Available  
Case # 8:11 CV 03180  
Atty: Aaron S. Jophlin

Scott v. Lake County S. O.  
Court: Currently Available  
Case # Currently Available  
Atty: Jason Reckseidler

Davis/Johnson v. Dr. Vistasp Karbhari, et al  
Court: Currently Available  
Case # Currently Available  
Atty: Douglas Fierberg

Anthony Nastrofilippo v. Borough of Little Ferry, et al  
Court: Currently Available  
Case # Currently Available  
Atty: Louis Zayas

Worosz v. Helnia, LLC  
Court: Currently Available  
Case # Currently Available  
Atty: Michelle Zeiger

William Battista v. Brass Ring Pub  
Court: Currently Available  
Case # Currently Available  
Atty: Michelle Zeiger

## 2012

Jennifer Micha and Charles W. Langstaff, II v. PGA  
Mexx, LLC d/b/a Cabo Flats  
15th Circuit Court, Palm Beach County  
Case # 50-2011-CS-009375  
Atty: Jacob M. Even

Laurie Domico v. Murphy Oil and Encompass  
Insurance  
15th Judicial Circuit FL  
Case # 502012CA008717  
Atty: Allison B. Lane

McCloud v. JAA, et. al.  
4th Judicial Circuit Duval County  
Case # 16-2012-CA-4576  
Atty: Clifford C. Higby

Edwards, Charles v. Deko Nightclub  
Circuit Court 9th Judicial Circuit Orange County, FL  
Case # 2012-CA-003152-0  
Atty: Douglas Green

Rose Powell v. Loris Healthcare System, et. al.  
Horry County SC 15th Judicial Circuit  
Case # 2011-CP-26-2550  
Atty: Scott Evans

Walkes, Basil v. Sabal Palms Apartment  
9th Judicial Circuit Orange County, FL  
Case # 2011 CA010647-O  
Atty: Nicholas Panagakis

Tracey Bernard Gilyard and Tiffany Adams v. Randy Benson,  
individually, and Richland County Sheriff's Department  
Federal US Dist. Court of SC  
Case # 3:12-CV-01336-CMC  
Atty: T. Jeff Goodwyn, Jr.

Jessica Taylor, as Personal Representative of the  
Estate of Jesse Calvin Taylor v. Richland County and  
Correct Care Solutions, LLC  
Columbia / Richland County SC  
Case # 2011-CP-40-4341  
Atty: C. Carter Elliott, Fr.

Butler, David Schiralli, et al v. Kmart  
US Dist Court Northern Dist. of Georgia Atlanta Div.  
Federal Court  
Case # 1:12-CV-0872-JEC  
Atty: Michael P. Carvalho

Russell Dawson v. Warden McKither Bodison, et al.  
Case No. 8:11-CV-1781-JFA-JDA  
Russell Dawson v. SCDC, et al.  
Dist. Court of SC, Anderson/Greenwood Div.  
Case # 2010-CP-18-1922  
Atty: C. Carter Elliott, Jr.

Rakes, Andrew v. Collier County Sheriff Department  
& Todd, Jessie  
20th Judicial Court  
Case # 11-CA-3921  
Atty: Daniel Sheppard

Pierson, Al-Kauthar, individually, and Al-Kauthar  
Pierson, Jr., a minor, by and through Al-Kauthar  
Pierson, natural father and legal guardian v. Bali at  
Oasis Neighborhood Association, Inc., The Continental  
Group, Inc., and Oasis Community Homeowners  
Association, Inc.  
Miami Dade County Circuit Court  
Case # 10-64691 Case Settled  
Atty: Michael C. Mattson

Samantha Jo Garland v. Belvin Lee Sherrill,  
Georgetown County and the Office of the Sheriff of Georgetown, South Carolina, Jointly, Severally or in the  
Alternative, and A. Lane Cribb, Individually and in his Official Capacity  
US District Court Orangeburg, Dist of South Carolina  
Case # 5:12-cv-00090-CMC-KDW  
Atty: Marvin Infinger

Trinity Jackson v. Joe Chavez, Jr. et al  
United States District Court for the Western District of Texas  
Case # 1:11-CV-417-LY  
Atty: Broadus A. Spivey

Torres v. City of Albuquerque, et al.  
2nd Judicial District Court  
Case # CV-2011-06551  
Atty: Kathleen J. Love

Anderson Quinones v. New Jersey State Police  
Essex County Superior Court of NJ  
Case # ESX-L-4566-08  
Atty: Adam J. Kleinfeldt

Calzada, et al. v Carribean Isles Villas Condominium Assoc., et al.  
No other info available at this time  
Atty: Anthony Soto

Lenyk R. Scott, Individually as Personal Representative of the Estate of Raymond Frederick Stewart v. Southern  
Management Corporation, et al.  
Prince George's County Circuit Court  
Case # CAL11-34154  
Atty: Stefan Shaibani

Terry and Patricia Gosner v. Thomas Simpson, The National Rifle Association, Gary Washer, Deborah Washer and Gary Chapman  
Oakland County Circuit Court, MI  
Case # 11-120207N0  
Atty: James O. Elliott

Nga Pham, Thuc Huynh, and Truc Huynh, Individually and as Person Representatives of the Estate of Hao Huynh, Deceased v. St. Del Rio Holdings, L.P. d/b/a Catalina Village Apartments, STDR Management, LLC, and Greystone Asset Management, L.P.  
281st Judicial District Court of Harris County, Texas  
Case # 2012-16150  
Atty: Ba M. Nguyen

Lorenzo Rouse v. South Carolina Department of Corrections  
U.S. District Court Charleston, SC  
Case # 2:11 - CV01152 DCN  
Atty: J. Ryan Heiskell

Estate of Trevor Neil Hawkins-Varinecz, by and through Thomas Varinecz, as the Personal Representative v. Carolina Forest High School, Horry County School District, SC State Department of Education, Marcus Rhodes, and Horry County Police Department  
Horry County SC and US Dist. Court SC Florence Div.  
Case # 4:11-CV-02638-TLW  
Settled  
Atty: Ed Bell

Glenn Jackson, Jr. v. Travis Steele, et al.  
US Dist. Court of Eastern Kentucky Ashland  
Case # 11-CV-0072-HRW  
Atty: Michael J. Curtis

Price v. B&B Cash Grocery Stores, Inc. d/b/a U-Save  
Palm Beach County 15th Judicial Circuit  
Case # 50-2011CA008784xxxxMBA  
Atty: Richard A. Ryles

Barbara Hyman, As Personal Representative of the Estate of Nelson Gray Hayman, III v. Town of Summerville, Summerville Police Department, Bruce Owens in his capacity as Chief of the Summerville Police Department, and Eddie K. McCreary  
Federal Court-District of South Carolina  
Case # 2:12-cv-02874-RMG  
Atty: Christopher J. McCool

Jason Morales v. MGLS, R.B. Jo, Inc.  
Palm Beach County Circuit Court 15th  
Judicial Circuit  
Case # 502010-CA021151  
Atty: Richard Schuler

Nicholson vs. Stoneybrook Apts.  
Palm Beach County FL 15th Judicial Circuit  
Case # 502010CA028355XXXXBad  
Atty: Anika Campbell

Jones vs. Commons  
4th Judicial Circuit  
Case # 2010 004803  
Atty: Aaron Finesilver

2011

Jane Doe1 vs. RCCL  
Jane Doe2 v. RCCL  
Atty: Michael D. Eriksen  
United States District Court  
Southern District of Florida  
Miami Division

Spears v. Winn Dixie  
15th Judicial Circuit  
Palm Beach County  
Case:09/0005  
Atty: Casey D. Shomo

Gurley v. Hollywood Towers  
Condominium Association  
Case #: File #0065956  
Broward Circuit Court  
17th Judicial Circuit  
Atty: Sia Najad

David Stockdale v. Edisto Group, LTD  
Case # 09-CA-002228  
Atty: Daniel A. Shapiro  
Lee County 20th Judicial Circuit, Lee County,

Tramaine Miller v. City Views of Rosa Burney Park Limited Partnership, et.al.  
Atty: Shawn Williams  
Civil Action File #: 2009CV08640C  
State Court of Clayton County, GA

Michael Maher v. CSC Lake Worth Limited and General Security Services, LLC.  
Case# 502007CA009725XXXXMBAJ  
Atty: Edmund Gonzalez  
15th Judicial Circuit  
Palm Beach County, FL

Heidrich, Cathy v. First BankShares and Richard Straub  
Atty: Eric Eide  
Circuit Court  
9th Judicial Circuit Orange  
County  
Claim #:EGH6551

Lonnie Scott v. Springbrook Commons/Gatehouse Mgt. Inc.  
Atty: Bryan Boysaw  
Not Yet Filed

Marlena Porter v. Rivertree Landing Apts.  
File: 0176-0008  
Atty: Rhonda Beesing  
Hillsborough County Tampa  
Case #: 09-027076  
Settled

Simmons v. Malasky Properties  
502010-ca-030275xxxxMBAO  
Richard A. Ryles, Esq.  
15th Judicial Circuit  
Palm Beach County, FL

Robert Kagan v. Wings-Up on the Westbank, et al.  
24th Judicial District Court for the Parish of Jefferson, State of Louisiana  
Attorney Michael B. Alker  
24th Judicial District Court for Parish of Jefferson, Louisiana  
Case No. 677-688, Div. "O:"

Marshall & Nancy Monroe  
v. Newaygo County  
File# 7948.10548  
Atty. William Mills  
Grand Rapids, MI  
US District Court  
Western Dist.  
MI  
Settled

Tracy Curry v. Brian Rogan, et al.  
State Court of Rockdale  
County, GA  
Civil Action # 2011SV1452  
Atty: Terry D. Jackson, P.C.

Nave vs. Clayton County Et Al  
Case # 1:09-CV3630-SCJ  
Atty: Terry D. Jackson  
US Dist. Court Northern  
Dist. of Georgia, Atlanta Div.

Baker vs. Winette  
US District Court  
Northern Dist. of Georgia  
1:11-CV-02728-WSD  
Atty: Terry D. Jackson

Gouger vs. Cobb Country Police Dept.  
Cobb County State Court  
Atty: Terry Jackson  
Case# 09A66811



Carl Berry v. Dollar Stores  
Atty. William F. McMurry  
Federal Court of Western  
District of Kentucky  
#3:11cv00495-crs

Camille Marques, et al.,  
vs. Club Pelican West  
et al.  
357th Judicial District Court  
Cameron County, TX  
J. Scott McClain  
Cause#2007-11-005495

Brandon Frye v. Dorchester  
County Sheriff's Dept. and  
Southeastern Service Group, Inc.  
Case No.: 2009-CP-18-1217  
State Court Dorchester County  
SC  
Atty: Lori Cromartie  
Bell Legal Group

Sanya Stewart as personal  
representative of the Estate of  
Peta-Gay Anderson, deceased,  
v. Shaker Village Condominium Assoc., a Florida Corporation  
Todd Michaels, Esq  
Haggard Law Firm.  
Case# 09032899  
17th Judicial Circuit  
Broward County

Lorenzo Rouse Case v. SCDC  
Atty: J. Ryan Heiskell  
Bell Legal Group  
Case# 2:11-CV-01152-DCN  
Dist. Court of S.C. Charleston Div.

Yan Zhao v. United States of America  
Atty: Timothy D. Hudson  
Western Dist of NY Buffalo  
Case Matter 06-cv-0106S

Baker v. Gwinnett County, GA  
US District Court for  
Northern District of GA  
Atlanta Div.  
Case 1:11-CV-02728-WSD

Bellamy v. Boomers  
Broward County Circuit Court  
Ft. Lauderdale, Florida  
Docket #: 0803273408  
Atty: Brad Edwards  
(Case tried)

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

<b>WILL O. KING,</b>	:	
	:	<b>JURY TRIAL DEMANDED</b>
<b>Plaintiff,</b>	:	
	:	<b>CIVIL ACTION FILE NO.</b>
<b>v.</b>	:	<b>1:15-CV-0583-TWT</b>
<b>KYLEMA JACKSON,</b>	:	
<b>Individually and in his Official</b>	:	
<b>Capacity as a City of Atlanta</b>	:	
<b>Police Officer, and</b>	:	
<b>THE CITY OF ATLANTA</b>	:	
<b>Defendants.</b>	:	

**CERTIFICATE OF SERVICE**

I hereby certify that on July 19, 2015, I electronically filed a copy of Plaintiff's First Amendment to Initial and Expert Disclosures with the Clerk of Court using CM/ECF system with service on all attorneys of record for the City of Atlanta electronically. I also hereby certify that since I cannot serve Defendant Kylema Jackson electronically, I have this day placed a copy in the U.S. Mail, first class, with adequate postage thereon to his address of 1650 Anderson Mill Road, #7103, Austell, GA 30106.

/s/ Richard B. Crohan  
**Richard B. Crohan**  
Georgia Bar No. 197120  
rcrohan@mcklaw.org